

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate And Fee Changes, 1997

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Docket No. R97-1

INTERROGATORIES OF
ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS PAUL G. SECKAR
(ANM/USPS-T26-1)
September 17, 1997
(Corrected September 22, 1997)

Pursuant to sections 25 and 26 of the Commission's Rules of Practice, the Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories and requests for production of documents. Instructions for these questions appear in Appendix A.

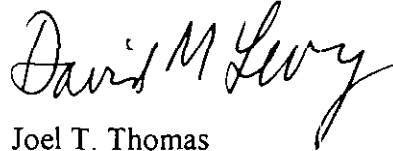
ANM/USPS-T26-1

USPS-T-26D, page 4, indicates that the unit mail processing cost for a Standard A Regular Rate Basic Presort Nonmachinable flat is 14.9486 cents. USPS-T-26E, page 4, indicates that the unit mail processing cost for a Standard A Nonprofit Rate Basic Presort Nonmachinable flats is 21.7917 cents. The difference between the Nonprofit and Regular Rate cost amounts to 6.8431 cents; *i.e.*, a Basic Presort Nonprofit Nonmachinable flat costs 46 percent more to process than a Basic Presort Regular Rate Nonmachinable flat.

- a. Please explain what accounts for this significant cost difference.

- b. Please provide a copy of, or a reference to, the underlying cost model(s) that document these unit costs.

Respectfully submitted,



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Counsel for Alliance of Nonprofit Mailers

September 22, 1997

INSTRUCTIONS

1. If the designated witness cannot answer a question, please redirect it to another witness who can.
2. If the requested data cannot be produced with reasonable effort in the exact format or level of detail requested, please produce all data available in (1) a substantially similar format or level of detail, or (2) susceptible to being converted to the requested format and detail.
3. The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimony, pamphlets, charts, tabulations, and workpapers. Documents also include information on computer media, microfilm and other non-paper media.
4. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. Workpapers shall include sufficient backup material to enable a third party to replicate the final results from the primary sources. Where arithmetic manipulations were performed by a computer with internally stored instructions, and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David M. Levy

September 22, 1997

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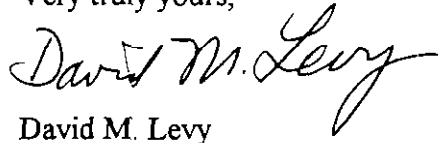
The Honorable Margaret P. Crenshaw
Secretary
Postal Rate Commission
1333 H Street, N.W.
Washington, DC 20268-0001

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Dear Ms. Crenshaw:

Enclosed for filing are a revised original and 24 copies of the Interrogatories of the Alliance of Nonprofit Mailers to USPS Witness Paul G. Seckar (ANM/USPS-T26-1). Please date stamp the extra copy for our files. The interrogatories were originally filed on September 17. In the revised document, the caption has been changed to correct the numbering of Mr. Seckar's testimony and the spelling of his name.

Very truly yours,


David M. Levy

Counsel for Alliance of Nonprofit Mailers

cc: All parties of record